

PUBLIC UTILITIES COMMISSION

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January 6, 1995

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FCC MAIL ROOM

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20036

Re: CC Docket No. 94-102, RM-8143

Dear Mr. Caton:

Please find enclosed for filing an original plus eleven copies of the COMMENTS OF THE PEOPLE OF THE STATE OF CALIFORNIA AND THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA in the above-referenced docket.

Also enclosed is an additional copy of this document. Please file-stamp this copy and return it to me in the enclosed, self-addressed, postage pre-paid envelope.

Very truly yours,

Ellen S. LeVine
Principal Counsel

Enclosure

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FCC MAIL ROOM

In the Matter of)
Revision of the Commission's)
to ensure compatability with)
enhanced 911 emergency calling systems)

CC Docket No. 94-102
RM-8143

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COMMENTS OF THE PEOPLE OF THE STATE OF CALIFORNIA
AND THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

The People of the State of California and the Public
Utilities Commission of the State of California ("CPUC") hereby
submit these comments in the above-docketed proceeding.

In its Notice of Proposed Rulemaking ("NPRM") the Federal
Communications Commission ("FCC") proposes rules to ensure
compatibility of enhanced 911 emergency services with (1) private
branch exchanges ("PBXs") and (2) two-way voice wireless
services. For PBX 911 access, the FCC has proposed a set of
rules concerning the manufacture and importation of PBX
equipment, information transfer protocols and network interfaces.
For wireless 911 access, the FCC has proposed a set of
performance criteria. The FCC seeks comment on which services
the rules should apply, namely whether existing services such as
cellular or new services such as personal communications services
("PCS") should be included.

The CPUC addresses both of these areas of inquiry below.

A. Compatibility of PBX with 911 Systems

California supports the FCC's efforts to ensure that PBX users have access to 911 services by ensuring that PBX systems are compatible with 911. California believes that standard equipment, interfaces and protocols will improve access to emergency services through the 911 system. However, there are certain areas, such as the Automatic Location Information ("ALI") data-base administration, which are best addressed at the local level.

B. Enhanced 911 service should be available to PBX users.

California supports the FCC's tentative conclusion that callers at PBX stations which can reach the public switched telephone network ("PSTN") should be able to reach emergency services by dialing 911. As the FCC's rulemaking points out, this capability is available in PBX equipment being produced today, but cannot be taken advantage of due to a lack of standardization. (NPRM Para. 8) Only the three digits 911 should be used to reach emergency services, not 9-911 or any other combination of digits. The proposed implementation schedule of twelve months for manufacture and importation, eighteen months for installation together with customer notification in the interim are reasonable.

Some of the features of enhanced 911, namely precise location information for each station, may not be necessary for PBXs serving a single location. There is no purpose in requiring

individual station location information for these PBXs. The determination of what constitutes a single location should be left to state and local governments.

C. The FCC should not establish rules for ALI database maintenance.

California believes that rules governing the administration of the ALI database are best handled at the state and local level. Arrangements for database maintenance vary and there is no advantage to federally-mandated rules for database administration. Rules should be limited to ensuring that the data is collected in a standard format established by the National Emergency Number Association ("NENA").

D. The FCC should establish rules for an Information Protocol Standard.

California supports a single national standard for 911 information protocol. The NENA format is broadly used and should serve as a standard protocol.

E. Compatibility of Wireless Services with Enhanced 911

Wireless access to enhanced 911 services is increasingly important. The wireless industry is growing rapidly with cellular subscribership increasing by 33% annually between 1989 and 1993. This growth is reflected in an increasing percentage of 911 calls originating on cellular phones. The addition of new

services, such as PCS, should accelerate this expansion as competitive pricing is introduced to the market.

In addition, wireless services may become a substitute for wireline services. Therefore, wireless consumers should receive 911 services comparable to those from wireline service.

Finally, the State of California has invested over one-half billion dollars to ensure that Californians receive prompt emergency services through the 911 system. California has recognized the importance of wireless access to 911 emergency services through legislation which requires 911 access for cellular end users with free airtime for 911 calls. (P.U. Code 2892)

For these reasons, California supports the FCC's efforts to ensure 911 access for all wireless consumers with service comparable to wireline standards, including the ability to provide location information. The remainder of these comments will focus on aspects of the proposed rules which are of particular concern to California.

F. The FCC should apply performance requirements to all two-way voice CMRS, including existing and new systems.

The proposed performance requirements should be applied equally to all real-time voice commercial mobile radio systems ("CMRS") including both existing systems, such as cellular and enhanced specialized mobile radio ("ESMR"), and new systems, such as PCS and satellite. It is critical that existing systems such as cellular provide enhanced 911 capability. Existing systems, namely cellular, currently and for the next few years will have

most of the customers that need access to 911. The FCC's proposed three phase implementation of location will reduce the burden of retrofitting existing systems. The "Survey of Location Technologies to Support Mobile 9-1-1" by C.J. Driscoll and Associates for the California Department of General Services Telecommunications Division has identified a number of technologies which currently or in the near future will allow location identification for wireless services. In addition, the use of performance requirements will allow the industry to select the most efficient technologies for achieving the goals of enhanced 911 access.

For new systems, such as PCS and satellite, recognition of performance criteria will allow compatibility with enhanced 911 to be designed and built into networks from the outset. Non real-time voice CMRS, such as two-way paging and portable voice mail services, may provide another valuable access to the 911 emergency services system. However, these services are sufficiently different from real-time voice systems that they may present significant difficulties for the caller to provide information and for the emergency service system to process it. Because of the distinct characteristics of non real-time voice CMRS, these systems should not be considered as part of the current proceeding.

- G. The FCC should adopt the proposed three stage phase in of User Location Information with more precise location information in the final stage.

California supports the FCC's proposed three-stage implementation of ALI requirements. By requiring identification of cell cite location in one year, approximate location and distance from the cell cite in three years and, finally, three dimensional location within five years, the FCC will allow carriers time to identify and deploy appropriate location technology. However, the third and final stage which requires location within 125 meters may not provide sufficiently precise information to emergency services. In dense urban environments 125 meters may cover disparate locations. This is especially problematic if wireless services become substitutes for wireline services, and the wireless services do not provide comparable location information. While 125 meters is a reasonable goal given current location technology, it may not be appropriate as a permanent standard. A provision to require the location distance to be reevaluated periodically should be considered.

In addition, the FCC should consider whether location systems based on a chip in each handset will be compatible with other technologies. If a customer who's home serving area location system is based on a handset chip roams into an area with an alternate technology they may not be locatable.

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H. Conclusion

For the reasons stated, California urges the following: (1) the FCC should require new PBX equipment to be compatible with 911 and (2) wireless consumers should have access to the features of enhanced 911, including location identification.

Respectfully submitted,

PETER ARTH, JR.
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By:

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